

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE:

Mary Ann DeCarlo

Case No.: 15-11760

Chapter: 13

Judge: A. Benjamin Goldgar

Debtor

Potestivo & Associates, P.C.
Keith H. Werwas (ARDC#6291042)
Kimberly J. Goodell (ARDC#6305436)
Ashley K. Rasmussen (ARDC#6308095)
David F. Pustilnik (ARDC#6300609)
Caleb J. Halberg (ARDC#6306089)
223 W. Jackson Blvd., Suite 610
Chicago, Illinois 60606
Telephone: (312) 263-0003
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Cook County Firm ID #: 43932
DuPage County Firm ID #: 223623
Attorneys for Ocwen Loan Servicing, LLC
Our File No.: C15-20657

Paul M Bach

Sulaiman Law Group, Ltd.
900 Jorie Boulevard, Suite 150
Oak Brook, IL 60523
(630)575-8181
Email: ecfbach@gmail.com

OBJECTION TO CONFIRMATION

NOW COMES Ocwen Loan Servicing, LLC (herein “Creditor”), by and through their attorney, Potestivo & Associates, P.C., and for their Objection to the Confirmation of the Chapter 13 Bankruptcy Plan filed for Debtor Mary Ann DeCarlo (herein “Debtor”) by her attorney Paul M. Bach state as follows:

1. The Debtor filed a Chapter 13 bankruptcy petition on March 31, 2015.
2. The Debtor filed his Chapter 13 bankruptcy plan on March 31, 2015.
3. The current plan states the arrears for the real property located at 33 E Honeysuckle Dr, Round Lake Beach Illinois 60073 are in the amount of \$8,000.00. Creditor has filed a secured claim with the arrearages in the amount of \$9,070.58.

WHEREFORE, Creditor respectfully requests that this Court deny confirmation of Debtors’ bankruptcy plan, and in addition, creditor hereby requests and moves this court to enter an

order dismissing this Bankruptcy case as the Debtor has not met the obligations set forth and has failed to propose a confirmable chapter 13 plan.

Dated: June 26, 2015

/s/ Caleb J. Halberg

Potestivo & Associates, P.C.

Caleb J. Halberg (ARDC#6306089)

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AFFIDAVIT OF SERVICE

I, Cathy Scanlan, state that on the 26th day of June 2015, I served a copy of the Objection to the Confirmation of the Plan and Affidavit of Service of same upon the below listed parties:

Mary Ann DeCarlo
33 E Honeysuckle Drive
Round Lake, IL 60073

Paul M Bach
900 Jorie Boulevard, Suite 150
Oak Brook, IL 60523

Office of the U.S. Trustee
219 S Dearborn St, Room 873
Chicago, IL 60604

Glenn B Stearns
801 Warrenville Road, Suite 650
Lisle, IL 60532

By placing same in a well sealed envelope, by first class mail, with the proper prepaid postage thereon and depositing same in a United States Mail receptacle in the City of Rochester Hills, State of Michigan to Debtor and via CM-ECF electronic filing to the Debtor's Attorney and the Trustee, and the U.S. Trustee

/s/ Cathy Scanlan

Cathy Scanlan